

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

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Roy Romer
Governor

Thomas M. Venton, M.D.
Executive Director

November 14, 1991

Mr. Fraser Lockhart
U.S. Department of Energy
P.O. Box 928
Golden, CO 80402-0928

Dear Mr. Lockhart:

The Colorado Department of Health, Hazardous Materials and Waste Management Division, ("the Division") has reviewed the "Proposed Interim Measure/Interim Remedial Action Decision Document for the Solar Evaporation Ponds Operable Unit 4, September 1991."

The most critical piece of information missing from the Decision Document are the analytical plan and standards for "raw water". On page 2-19, the Summary of Pond Characteristics, Tritium has been measured as high as 3,000 pCi/Liter. It is unlikely that evaporation will separate Tritium into the concentrate. Tritium is a beta emitter with a half-life of 12.26 years. Raw water is used as process make-up, boiler blowdown or in cooling towers where Tritium is likely to be aerosolized or vaporized into the air. Once in the air, Tritium is likely to be inhaled by plant personnel where it can do the most damage. The "Division" will not approve the Decision Document until the "analytical plan" alluded to on page 3-11 is submitted and approved by the Division and EPA.

Attached you will find the remainder of our comments. If you have any questions regarding this matter please feel free to contact Norcen Matsuura of my staff at 331-4920.

Sincerely,

Norcen Matsuura

Gary W. Baughman, Unit Leader
Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc. Martin Hestmark, EPA
Brent Lewis, DOE
Randy Og, EG&G
B. Barry, RFP
Dan Miller, AGO

ADMIN RECORD

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